Remarks

The Office action dated December 2, 2009, has been reviewed and carefully considered. Claims 21, 24, 27, and 36 have been amended. Claims 23, 29, and 37-38 have been canceled without prejudice. After entry of these amendments, claims 21-22, 24-28, and 30-36 will be pending in the application. Applicant respectfully requests reconsideration in view of the following comments.

Information Disclosure Statement

Applicant notes that the IDS submitted on November 16, 2005, was only partially initialed. Specifically, the two references in the 'Other References' section of the IDS were not initialed as being considered by the Examiner. Applicant requests that these references be considered and initialed.

35 U.S.C. §103 Rejections

Claims 21-25 and 30-38 were rejected as allegedly being obvious over U.S. Patent No. 5,427,128 (Minkin). This rejection is respectfully traversed.

Minkin does not disclose or suggest all of the features of independent claim 21. At best, Minkin teaches the use of separate manifolds, one of which seems to move, one of which is stationary. The manifolds of Minkin are supplied with different liquids and operate at different times. As will be described further below, claim 21 recites a parts washer having a plurality of manifolds which are moveably mounted, with at least one vertical spray manifold and at least one horizontal spray manifold receiving a common cleaning fluid, and operating simultaneously, in direct contrast to Minkin.

For example, claim 21 recites a parts washer having at least one horizontal spray manifold that is "coupled with an interconnecting manifold which extends in a generally vertical direction, the interconnecting manifold arranged to reciprocate in an arc about a vertical axis to cause the at least one horizontal manifold to undergo reciprocal movement in a generally horizontal plane." Minkin does not disclose or suggest such an arrangement. While Minkin does not disclose any motion of the wash manifold 32, page 5 of the Office action argues that FIG. 3 of Minkin suggests a horizontal spray manifold arranged to undergo horizontal reciprocal movement in a generally horizontal plane and further argues that it would have been obvious to

arrange the rinse manifold 42 to undergo reciprocal vertical motion. On the contrary, neither the rinse manifold 42 nor the wash manifold 32 of Minkin are configured to undergo reciprocal vertical motion, due to the heat exchanger 56 and the horizontal structure extending from wash pump 104 to the wash manifold 32, both of which would prevent reciprocal vertical motion. Furthermore, the present claim 21 recites a horizontal manifold coupled with an interconnecting manifold which extends in a generally vertical direction, the interconnecting manifold arranged to reciprocate in an *arc about a vertical axis* to cause the at least one horizontal manifold to undergo reciprocal movement in a generally horizontal plane. Neither the rinse manifold 42 nor the wash manifold 32 of Minkin reciprocate in an arc about a vertical axis to cause a horizontal manifold to undergo reciprocal movement in a generally horizontal plane. Rinse manifold 42 does not seem capable of movement at all. Wash manifold 32, at best, rotates about its own vertical axis, but cannot reciprocate in an arc about a vertical axis given the structure disclosed in Minkin.

Claim 21 further recites "an inlet manifold coupled to, and in fluid communication with, both the interconnecting manifold and the vertical manifold, the inlet manifold supplying a *common cleaning fluid simultaneously to the plurality of spray manifolds* wherein the common cleaning fluid is sprayed simultaneously from the at least one horizontal spray manifold and the vertical spray manifold toward the receptacle." In Minkin, there is no inlet manifold that supplies a common *cleaning fluid* simultaneously to both the wash manifold 32 and the vertical manifold 42.

The Office action alleges on page 3 that "it would be inherent and obvious that the water used in the nozzles come from a common source/supply along the supply chain" (emphasis added). With respect, the Office action's argument with respect to a common *water* source is not relevant to the present claims, which recite a common *cleaning fluid* supply. Cleaning fluid and water are not the same, nor would one substitute one for the other (*e.g.*, one would rinse with water, but would not rinse with cleaning fluid). The Office action contends on page 3 that "the water source is thus a common cleaning fluid supply" because "Minkin clearly teaches that a fresh water source supplies water to the fluid holding space 18 (which even Applicant admits that wash manifold 32 sprays cleaning fluid from) or to a rinse manifold 42." While Minkin states that "water...from a fresh water source...is either supplied directly to the fluid holding space 18 or to a rinse manifold 42," this does not indicate that the rinse manifold 42 and the wash

manifold 32 receive cleaning fluid from a common cleaning fluid supply. Col. 4, lines 53-55. On the contrary, rinse manifold 42 receives water from the fresh water source, while wash manifold 32 does not: the pump system 30 is only activated to take cleaning fluid 20 to the wash manifold 32 after "appropriate chemicals" such as cleaning agents are "added to the water in the fluid holding space 18." Col. 4, lines 52-57 and col. 4, line 64 to col. 5, line 8. Thus, Minkin does not teach or suggest the inlet manifold as recited in claim 21.

Finally, claim 21 recites "a spray manifold drive motor coupled to the plurality of spray manifolds and arranged to simultaneously drive the at least one horizontal spray manifold and the vertical spray manifold wherein the at least one horizontal spray manifold and the vertical spray manifold simultaneously undergo their respective reciprocal motions." In Minkin, there is no disclosure of the vertical manifold 42 moving at all, much less moving in a reciprocal linear motion generally along a longitudinal axis of the vertical spray manifold

The Office action contends on page 3 that it would have been obvious to one of ordinary skill in the art to use "both the rinse and wash nozzle together for washing, and then again for rinsing." With respect, if one were to use both the rinse and wash manifold together, even if they were used together twice, the parts would not be sufficiently washed nor sufficiently rinsed. Thus, Minkin would not function as intended. Using both of Minkin's manifolds together would result in rinsing water being sprayed during the cleaning cycle, which would reduce the effectiveness of the cleaning fluid. Further, using both of Minkin's manifolds together would result in cleaning fluid being applied during the rinsing cycle, which would defeat the purpose of the rinse, because it would apply more cleaning fluid at the same time. Minkin does not suggest to one of ordinary skill in the art to apply the rinse and wash manifolds at the same time, nor would one of ordinary skill be motivated to do so after reading Minkin.

The Office action further alleges on page 3 that "having selective connectivity would also make obvious the claimed invention." Minkin makes no suggestion of such selective connectivity being possible. At best, Minkin teaches the use of separate manifolds, one of which seems to move, one of which is stationary, the manifolds are supplied with different liquids and operate at different times, in direct contrast to the parts washer recited in claim 21. Minkin simply does not disclose or suggest the parts washer recited in claim 21. Any suggestion that it does is, respectfully, impermissible hindsight.

Claims 22-25 and 30-38 depend from claim 21 and thus are not obvious over Minkin for at least the same reasons claim 21 is not obvious, and because each dependent claim recites a distinctly patentable combination of features. Withdrawal of the rejection is requested.

Claims 26-29 were rejected as allegedly being obvious over Minkin and U.S. Patent No. 2,518,239 (Leigh). This rejection is respectfully traversed.

Claims 26-29 depend from claim 21, and thus are not obvious over Minkin for at least the same reasons claim 21 is not obvious over Minkin. Leigh is relied on for its alleged teaching of a drive wheel, a supply pipe having a return bend and an elbow bend, and cams. Leigh thus does not cure the defects of Minkin discussed above in connection with claim 21, and thus claims 26-29 cannot be obvious over Minkin and Leigh for at least the same reasons these claims are not obvious over Minkin.

Furthermore, one of ordinary skill in the art would not combine Minkin and Leigh in the way the Office action suggests. First, Minkin and Leigh are directed to very different technologies: Minkin describes a parts washer, whereas Leigh concerns a spraying apparatus for applying waste liquor to the walls of a recovery furnace. See Leigh col. 1, lines 8-16 and 39-43. Minkin's parts washer is designed to wash three-dimensional parts that are moving on a turntable, whereas Leigh's spray nozzle is designed to spray on a stationary flat wall. Thus, the objects, applications, and fields of these inventions are entirely different, and one of ordinary skill in the art would not look to Leigh for motivation concerning a parts washer.

As a result of the industrial application of the device disclosed in Leigh, the apparatus is somewhat complex. On the other hand, Minkin emphasizes the need for a parts washer that overcomes problems in a "simple manner." Minkin col. 1, lines 55-57. Thus, one of ordinary skill in the art would not modify the simple machine disclosed in Minkin with a complex mechanism from Leigh, because such a modification would directly contradict Minkin's teaching of a simple machine.

Even if one of ordinary skill in the art did combine the teachings of Leigh and Minkin, one would still not arrive at the parts washer recited in claim 21, for the reasons stated above. Withdrawal of the rejection is requested.

For at least these reasons, Applicant submits that all pending claims are allowable over Minkin and Leigh, and thus requests all claim rejections be withdrawn. Should any questions remain regarding this application, Examiner Ko is invited to contact the undersigned attorney at the telephone number below.

Respectfully submitted,

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